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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies Monthly Progress Report
Area 1 – Morrow Dam to Plainwell Dam (March 2008)

INDUSTRIAL

Dear Jim:

Date:
April 15, 2008

Attached is the thirteenth monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigation/Feasibility Study (SRI/FS) – Area 1. This progress report is submitted as per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864), as well as Section 7.1 of the associated Statement of Work (SOW). If you have any questions, please do not hesitate to contact me.

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Sincerely,

ARCADIS

Michael J. Erickson, P.E.
Associate Vice President

Our ref:
B0064539.00014 #2

Attachments

Copies:

Michael Berkoff, USEPA
Sam Chummar, USEPA
Michael Ribordy, USEPA
Paul Bucholtz, MDEQ (with Attachment A)
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**MONTHLY PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE SRI/FS
AREA 1 (MORROW DAM TO PLAINWELL DAM)**

REPORT #13, MARCH 2008

**PREPARED BY ARCADIS
APRIL 15, 2008**

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP (KRSG)

SUBMITTED TO

**JAMES SARIC, REMEDIAL PROJECT MANAGER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA)**

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS – Area 1**

REPORT #13, MARCH 2008

**Significant Developments and Activities during the Period, Including Actions Undertaken
Pursuant to the AOC and SOW**

- On March 3, ARCADIS received the MDEQ's comments (dated February 22) on the draft Conceptual Site Model. This report is discussed in Section 1.2.1.4 of the SOW.
- On March 3, ARCADIS forwarded to the USEPA the Plainwell post-removal surface sediment PCB sampling results for removal areas completed in 2007.
- On March 10, the USEPA forwarded comments to the KRSG on the Data Management Plan (see Section 1.3 of the SOW).
- On March 11, the KRSG forwarded to USEPA the draft letter agreement with the peer review manager.
- On March 12, the KRSG received the USEPA's letter regarding the Risk Assessment Framework (RAF). The letter was dated February 28, 2008. This framework is discussed in Section 1.2.1.5 of the SOW.
- On March 13, the KRSG and USEPA met in Chicago to discuss the RAF.
- On March 14, the MDEQ forwarded comments to the KRSG on the Data Management Plan (see Section 1.3 of the SOW).
- On March 18, the USEPA forwarded comments to the KRSG on the Baseline Ecological Risk Assessment Peer Review Scope of Work (peer review SOW).
- On March 27, ARCADIS forwarded to the USEPA a draft letter regarding the selected peer review panel for ecological risk studies and the revised draft peer review SOW.
- On March 27, ARCADIS forwarded to the USEPA a draft letter regarding the revision of the draft RAF.
- On March 31, ARCADIS forwarded to the USEPA PowerPoint slides for use at the public meeting scheduled for April.
- On March 31, ARCADIS forwarded to the USEPA and MDEQ a request to dispose of archived Area 1 sediment cores.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS – Area 1**

REPORT #13, MARCH 2008

- The KRSG awaits USEPA's response to the letter requesting USEPA's data usability determination for existing data for purposes of the SRI/FS, which was submitted to USEPA on August 27, 2007.
- The KRSG awaits USEPA's comments on the Multi Area Feasibility Study documents (Section 1.2.2 of the SOW) and the Candidate Technologies and Testing Needs Technical Memorandum (Section 4.1 of the SOW), which were submitted to USEPA on February 22.

Data Collected and Field Activities Conducted During the Period

- Beginning on March 26, ARCADIS began collecting water column samples every other day at the upstream and downstream locations related to the Former Plainwell Impoundment Time-Critical Removal Action (TCRA). Table A summarizes the samples collected that were sent to TestAmerica Laboratories, Inc. (TestAmerica) for analysis. This sampling is discussed in Section 3.4.5 of the Area 1 SRI/FS Work Plan.

Laboratory Data Received During the Period

- No laboratory data were received in March.
- Validated data for the SDGs received in January are included in this monthly report. These data include the surface water samples collected between December 15 and December 19 (SDG TCRA26) (Table B). Attachment A contains the validation report for this package. The enclosed CD also contains the EDD for these data.

Problems

- None.

Actions Taken to Correct Problems

- None.

Developments Anticipated During the Next Two Reporting Periods

- On April 1, ARCADIS will forward to the USEPA a letter regarding the selected peer review panel for ecological risk studies.
- On April 1, the USEPA will forward to the KRSG comments on the March 27 letter regarding the revision of draft RAF.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
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- On April 2, the USEPA will hold a public meeting in Plainwell.
- In April, the USEPA and KRSG will continue to work on the Peer Review Process (see Section 1.2.1.3 of the SOW).
- In April, KRSG is scheduled to provide a report presenting Area 1 SRI Phase 1 data to USEPA and MDEQ.
- In April, KRSG is scheduled to provide to USEPA a letter documenting RAF meeting agreements.
- In April, KRSG is scheduled to submit the revised RAF to USEPA.
- By April 18, KRSG is scheduled to submit the revised Generalized Conceptual Site Model to USEPA.
- In April, ARCADIS will continue to work on the development of Phase 2 sampling plans for Area 1, as described in the Area 1 SRI/FS Work Plan.
- In April, the MDEQ is scheduled to provide a copy of its USEPA-approved Quality Assurance Plan to the KRSG.
- On May 13 and 14, the peer review panel is scheduled to meet for delivery of the peer review panel charge.
- In May, ARCADIS is scheduled to submit to USEPA the validated data for the SDGs received in February. This includes the top-of-bank soil cores (SDGs SRI005 and SRI006), and the post-removal surface sediment samples from the 2007 TCRA removal areas (SDGs SRI007 and SRI008).

**Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Report #13, March 2008**

Table A — Upstream/Downstream Surface Water Sampling — Plainwell
TCRA — Samples Collected in March 2008

| Sample ID | Sample Date | Data Received | Sample Delivery Group | Sample Location |
|-----------|-------------|---------------|-----------------------|----------------------|
| K30779 | 3/27/2008 | NR | NR | 10th Street Bridge |
| K30780 | 3/27/2008 | NR | NR | Farmer Street Bridge |
| K30781 | 3/29/2008 | NR | NR | 10th Street Bridge |
| K30782 | 3/29/2008 | NR | NR | Farmer Street Bridge |
| K30783 | 3/31/2008 | NR | NR | 10th Street Bridge |
| K30784 | 3/31/2008 | NR | NR | Farmer Street Bridge |

Notes:

NR - Data not received as of March 31, 2007.

All samples analyzed by TestAmerica Laboratories, Inc. for PCBs and TSS.

Duplicate samples are in brackets.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
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Table B — Results for Upstream/Downstream Surface Water — Plainwell TCRA — Data Received in January 2008

| Location ID: Date Collected: Sample Name: | Units | 10th Street 12/15/07 | 10th Street 12/17/07 | 10th Street 12/19/07 | Farmer Street 12/15/07 | Farmer Street 12/17/07 | Farmer Street 12/19/07 |
|---|-------|-------------------------|-------------------------|-------------------------|---------------------------|---------------------------|---------------------------|
| PCB Aroclors | | | | | | | |
| Aroclor-1016 | ug/L | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U |
| Aroclor-1221 | ug/L | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U |
| Aroclor-1232 | ug/L | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U |
| Aroclor-1242 | ug/L | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U |
| Aroclor-1248 | ug/L | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U |
| Aroclor-1254 | ug/L | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U |
| Aroclor-1260 | ug/L | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U |
| Total PCBs | ug/L | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U | 0.047 U |
| Miscellaneous | | | | | | | |
| Total Suspended Solids | mg/L | 4.3 | 2.4 | 2.2 | 3 | 3.5 | 5.6 |

Note Regarding Data Qualifiers:

U - The compound was analyzed for but not detected. The associated value is the compound quantitation limit.